

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**In re:**

**Bankruptcy No. 13-51591-KMS**

**WILLIAM D. ANDERSON**

**Debtor**

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**AMENDED MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW the Creditor Sherri B. Anderson, and through counsel respectfully moves this Court for Relief From the Automatic Stay so that she may pursue previously filed Motions for Contempt and to Enforce Child Custody and Property Settlement Agreement in the Chancery Court of Hancock County, Mississippi. In support thereof, the Creditor submits as follows:

1. For the reasons more thoroughly stated in the accompanying Memorandum of Authorities in Support of the Motion for Relief from the Automatic Stay, the Creditor respectfully submits that she is entitled to relief from the Automatic Stay Provision. Certain debts that the Debtor is seeking to discharge are obligations of child support and thus are not dischargeable under 11 U.S.C.S. § 362(b)(A)
2. In further support thereof, the Creditor attaches:
  - a. The Judgment of Divorce (Exhibit "A")
  - b. Child Custody and Property Settlement Agreement (Exhibit "B")
  - c. Schedule H of the Debtors Bankruptcy Filings (Exhibit "C")
  - d. Schedule F of the Debtors Bankruptcy Filings (Exhibit "D")

WHEREFORE PREMISES CONSIDERED the Creditor respectfully submits that the Creditor Sherri B. Anderson should be granted relief from the automatic stay provision in the above referenced matter so that she may renew and pursue previously filed motions in the Chancery Court.

RESPECTFULLY SUBMITTED this the 2<sup>nd</sup> day of April, 2014.

PLAINTIFF, SHERRI ANDERSON

/s/Edward Gibson

BY: EDWARD GIBSON, ESQ., MSB# 100640  
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**CERTIFICATE OF SERVICE**

I DO HEREBY CERTIFY that on this day I caused to be served via U.S. First Class Mail, postage prepaid, a true and correct copy of the foregoing *Motion for Relief from Automatic Stay* to all known parties of record as indicated below.

William D. Anderson  
16208 Henri Court  
Biloxi, MS 39532

SO CERTIFIED, this the 2<sup>nd</sup> day of April, 2014.

/s/Edward Gibson

Edward Gibson, Esq.